

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-04100011-2011**
Application Received: **February 2, 2011**
Plant Identification Number: **03-54-04100011**
Permittee: **Dominion Transmission, Inc**
Facility Name: **Kennedy Compressor Station**
Mailing Address: **445 West Main Street**
Clarksburg, WV 26301

Revised: (Date of Revision)

Physical Location:	Valley Chapel, Lewis County, West Virginia
UTM Coordinates:	543.59 km Easting • 4328.71 km Northing • Zone 17
Directions:	Interstate 79 North to the Jane Lew Exit (Number 105). Turn right on County Route 7 and go 0.8 miles to Jane Lew, intersection of U.S. Route 19. Turn left on U.S. Route 19 and travel 4.7 miles to County Route 12, the Jackson's Mill Road. Turn right on County Route 12 and travel 2.4 miles, bear left and cross a narrow bridge to Jackson's Mill State 4-H Camp, County Route 12 changes to County Route 10 at this point, proceed 0.6 miles to the intersection of County Route 1, turn left and go approximately 200 yards to Valley Chapel Road, County Route 10. Turn right and go approximately 1.3 miles, turn left and cross a wooden plank bridge to the site.

Facility Description

Kennedy Compressor Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of two (2) 1100 HP natural gas fired reciprocating engines, one (1) dehydrator reboiler, one (1) dehydration unit, one (1) dehydration unit still flare and eight (8) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	57.07	136.54 ¹
Nitrogen Oxides (NO _x)	187.07	392.17 ¹
Particulate Matter (PM ₁₀)	1.09	
Total Particulate Matter (TSP)	1.09	0.61
Sulfur Dioxide (SO ₂)	0.05	0.04
Volatile Organic Compounds (VOC)	110.054	206.82 ¹

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2010 Actual Emissions
Formaldehyde	2.83	3.26 ^{1,2}
Acrolein	0.49	0.46
Acetaldehyde	0.60	0.46
Benzene	0.28	3.72 ²
Ethylbenzene	0.18	0.01
Hexane	0.16	2.21 ²
Toluene	0.78	6.35 ²
Xylene	2.72	4.57 ²

Some of the above HAPs may be counted as PM or VOCs.

¹ Company found more specific emissions factors for Engine #1 from the manufacturer of the unit for NO_x, CO, VOC, & Formaldehyde. So previous actual emissions reported will be significantly higher than the new potential due to a drastic drop in Engine #1 emissions.

² HAPs (formaldehyde, benzene, hexane, toluene, xylene) changed due to the dehydration unit flare being permitted as a control device. Therefore, since last modification company is able to assume 95% destruction efficiency for the dehydration unit emission. Previously, the company could not assume any destruction efficiency.

Title V Program Applicability Basis

This facility has the potential to emit 187.07 tons per year of NO_x, 57.07 tons per year of CO, and 110 tons per year of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Opacity Requirements for boilers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur requirements for fuel burned
	45CSR11	Standby plans for emergency episodes.
	45CSR13	
	45CSR17	Control fugitive particulate matter
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. § 63.11	Control Device General Provisions
	40 C.F.R. 63 Subpart HH	NESHAP Natural Gas Production Facility
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR42	Greenhouse Gas Emissions Inventory Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2837	August 16, 2010	N/A

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The facility's last Title V significant modification was issued on February 14, 2011. Since the last modification, there have been no equipment changes at the facility. The following change has been made in Title V permit language.

- Section 3.3.1.d was added to the permit for testing requirements.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule.

The facility has not made any changes that trigger a PSD modification; therefore, the requirements of the GHG tailoring rule are non-applicable.

40 CFR 64 (CAM Rule) –According to 40 C.F.R § 64.5(a) and (b), 40 CFR 64 (CAM Rule) has to be addressed only if there is a large PSEU (Emission Unit with potential to emit emissions at major source threshold after controls) at this facility. There is no large PSEU at this facility after permitting the federally enforceable flare.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: March 30, 2011
Ending Date: April 29, 2011

All written comments should be addressed to the following individual and office:

Beena Modi
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. (enter ext. no.) • Fax: 304/926-0478

Response to Comments (Statement of Basis)